

**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

THE CITY OF URBANA, THE CITY OF )  
CHAMPAIGN, and the COUNTY OF )  
CHAMPAIGN, ILLINOIS, all Municipal )  
Corporations, bodies politic and corporate, in )  
Champaign County, Illinois, )  
Joint Petitioners, )

v. )

Docket No. T11-0134

ILLINOIS CENTRAL RAILROAD COMPANY, )  
and the ILLINOIS DEPARTMENT OF )  
TRANSPORTATION, )  
Respondents. )

Joint Petition for an Order of the Illinois Commerce )  
Commission regarding a separation of grades and )  
an authorization for the construction of a highway )  
bridge over the Illinois Central Railroad Company )  
railroad tracks (MP 124.70) at the tracks' )  
intersection with the Olympian Drive Extension in )  
Champaign County, Illinois, an apportionment of )  
costs thereof, including directing payment to be )  
borne by the Grade Crossing Protection Fund, and )  
other stated or requested relief. )

**MOTION FOR AMENDMENT OF JOINT PETITION BY INTERLINEATION**

NOW COME the Joint Petitioners, by and through their Attorney Jon K. Ellis, and move  
the Administrative Law Judge to enter an Order approving the following amendment by  
interlineation of the Joint Petition filed herein:

on page 7, by changing the first sentence of Paragraph 26 to read as follows:

“**26.** The ICC should grant this Joint Petition because the Olympian Drive bridge as  
opposed to an at-grade crossing is necessary in order to enhance the public health, safety,  
convenience and welfare.”; and

by changing page 8 to read as follows:

“WHEREFORE, the Joint Petitioners The City of Urbana, The City of Champaign, and the County of Champaign, Illinois respectfully request that the Commission set this Joint Petition for hearing at the earliest opportunity and enter an Order pursuant to Section 18c-7401 of the Illinois Commercial Transportation Law (625 ILCS 5/18c-7401):

~~(i) finding that the proposed Olympian Drive bridge and its related highway improvements as set out herein are necessary and in the interest of the public health, safety, convenience and welfare;~~

~~(ii)~~ authorizing the construction of the Olympian Drive bridge over the Illinois Central Railroad Company’s rail lines at Railroad Milepost 124.70 in Champaign County, Illinois;

(ii) ~~(iii)~~ apportioning the eligible costs of the project between and among the Grade Crossing Protection Fund, Illinois Central Railroad Company, IDOT, The City of Urbana, The City of Champaign, the County of Champaign, Illinois, and various State and federal funds;

(iii) ~~(iv)~~ providing that, upon completion of construction, the West one-half (½) of the Olympian Drive bridge will thereafter be maintained by The City of Champaign and the East one-half (½) of the Olympian Drive bridge will thereafter be maintained by The City of Urbana;

(iv) ~~(v)~~ providing that Illinois Central Railroad Company shall remain responsible for all railroad ballast, ties, rails and any other railroad related facilities running under, near and/or along the newly-constructed Olympian Drive highway bridge; and

(v) ~~(vi)~~ for such other relief deemed just and proper.”

WHEREFORE, the Joint Petitioners move for an Order approving the foregoing amendment by interlineation of the Joint Petition filed herein, and such other relief deemed just and proper.

Respectfully submitted,

The City of Urbana, The City of Champaign,  
and the County of Champaign, Illinois, Joint  
Petitioners

By: /s/ Jon K. Ellis

Jon K. Ellis

Attorney for Joint Petitioners

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**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

THE CITY OF URBANA, THE CITY OF )  
CHAMPAIGN, and the COUNTY OF )  
CHAMPAIGN, ILLINOIS, all Municipal )  
Corporations, bodies politic and corporate, in )  
Champaign County, Illinois, )  
Joint Petitioners, )  
v. )  
ILLINOIS CENTRAL RAILROAD COMPANY, )  
and the ILLINOIS DEPARTMENT OF )  
TRANSPORTATION, )  
Respondents. )  
)

Docket No. T11-0134

Joint Petition for an Order of the Illinois Commerce Commission regarding a separation of grades and an authorization for the construction of a highway bridge over the Illinois Central Railroad Company railroad tracks (MP 124.70) at the tracks' intersection with the Olympian Drive Extension in Champaign County, Illinois, an apportionment of costs thereof, including directing payment to be borne by the Grade Crossing Protection Fund, and other stated or requested relief.

**NOTICE OF FILING**

TO ALL PARTIES OF RECORD:

PLEASE TAKE NOTICE that the Joint Petitioners have filed a Motion for Amendment of Joint Petition by Interlineation in the above-captioned Matter with the Illinois Commerce Commission on August 22, 2012. A copy of the aforementioned Motion has been e-mailed to each of the individuals listed on the attached Certificate of Service.

Respectfully submitted,

The City of Urbana, The City of Champaign,  
and the County of Champaign, Illinois, Joint  
Petitioners

By: /s/ Jon K. Ellis  
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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that service of the foregoing Motion for Amendment of Joint Petition by Interlineation was made, in addition to electronic filing with the Illinois Commerce Commission, by e-mailing a true and accurate copy thereof to:

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to each of their respective e-mail addresses listed above, on August 22, 2012.

/s/ Jon K. Ellis  
Jon K. Ellis